Federal Defenders

OF NEW YORK, INC.

Eastern District One Pierrepont Plaza, 16th Floor Brooklyn, NY 11201

Tel: (718) 330-1200 Fax: (718) 855-0760

Tamara L. Giwa Executive Director

Michelle A. Gelernt Attorney-in-Charge

January 24, 2025

The Honorable Peggy Kuo United States Magistrate Judge Eastern District of New York 225 Cadman Plaza East Brooklyn, New York 11201

> Re: *United States v. Su Zuqi* Criminal Docket No. 23-MJ-663 (RML)

Dear Judge Kuo:

I write with an updated request, and updated proposed order, regarding the return of the cash bail that was posted in this case. As mentioned in my previous motion for the return of cash bail, see ECF No. 17, the Court held a bond hearing for Mr. Su on July 27, 2023 and ordered him released on a consent bail package that included cash bail in the amount of \$50,000. Minute Entry dated July 27, 2023. That cash bail was posted on July 31, 2023, and Mr. Su was ordered released the same day. ECF No. 9.

After his release, Mr. Su was charged by information and his case was assigned to Judge Morrison. See United States v. Su, no. 24-cr-15 (NRM). He has since been sentenced and his case is now closed. He was sentenced to time served and ninety days of supervised release, which he has since completed.

Given that his case has concluded, Mr. Su now seeks the return of the cash bail posted on his behalf. A proposed order is attached. I have discussed this matter with AUSA Alex Solomon, and the government has no objection.

Thank you for your consideration.

Respectfully submitted,

/s/ Jeffrey S. Dahlberg Jeffrey S. Dahlberg Counsel for Zuqi Su Federal Defenders of New York, Inc. One Pierrepont Plaza, 16th Floor Brooklyn, NY 11201 718-407-7411 jeff_dahlberg@fd.org

AUSA Alex Solomon cc:

AUSA Gilbert Rein